

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LESTER LEE,
Plaintiff,

v. Civil Case No. 8:24-cv-01205-ABA

BROOKSIDE PARK CONDOMINIUM, INC.,
METROPOLIS (aka MCM, INC.),
RAMMY AZOULAY, and
LAMONT SAVOY,
Defendants.

**PLAINTIFF'S MOTION FOR PROTECTIVE ORDER TO LIMIT FURTHER
DISCOVERY ABUSE AND RETALIATION**

COMES NOW Plaintiff Lester Lee, appearing pro se, and respectfully moves this Honorable Court for entry of a Protective Order pursuant to Fed. R. Civ. P. 26(c), to prevent further abusive, excessive, and retaliatory discovery by Defendants. In support of this motion, Plaintiff states the following:

1. Plaintiff is a disabled individual proceeding without counsel. Despite limitations in resources and health, Plaintiff has complied with discovery in good faith while bearing the full burden of litigation as his own investigator, paralegal, researcher, and legal representative.
2. Defendants, who share legal counsel or are acting in coordination, have engaged in a pattern of discovery abuse. This includes serving over-limit interrogatories, submitting duplicative and harassing requests, and issuing irrelevant and invasive

lines of questioning targeting Plaintiff's disability, housing history, and personal credibility.

3. Defendants have also used surveillance devices (including a Ring camera and peephole camera) and engaged third parties to provoke incidents for the purpose of fabricating evidence. Such conduct is not only retaliatory but may violate Maryland wiretap and privacy laws.
4. Plaintiff has been subjected to overlapping interrogatories and conflicting demands from three aligned parties. These actions appear coordinated to create litigation fatigue and procedural failure, rather than to obtain relevant evidence.
5. During this time, Plaintiff has continued to experience the effects of prior harm, including the death of a service animal, HVAC failures, and harassment. Defendants have ignored accommodation requests and used agency coordination to misdirect inspections and interfere with Plaintiff's housing stability.
6. Plaintiff now seeks a Protective Order that (1) limits any further interrogatories without prior leave of court; (2) bars Defendants from engaging in surveillance-based discovery or using unlawfully obtained footage; (3) prohibits discovery requests targeting Plaintiff's unrelated housing, finances, or disability history; and (4) preserves Plaintiff's right to object and supplement filings after further review.

WHEREFORE, Plaintiff respectfully requests this Court enter a Protective Order barring Defendants from further abusive discovery, and acknowledges that a request for similar protective relief has also been submitted in Plaintiff's concurrently filed Motion for Temporary Restraining Order and Motion to Disqualify Counsel. Plaintiff requests

that this motion be considered as both a stand-alone request and as supplemental support for the injunctive and ethical remedies sought therein.

Respectfully submitted,

Lester Lee
Plaintiff Pro Se

Email: llee.documents@gmail.com

Date: June 16, 2025